Steven T. Wax, OSB No. 85012 Federal Public Defender 101 SW Main Street, Suite 1700 Portland, OR 97204 Tel: (503) 326-2123

Fax: (503) 326-5524

Email: steve_wax@fd.org

Lawrence Matasar, OSB No. 74209 621 SW Morrison Street, Suite #1025

Portland, OR 97205 Tel: (503) 222-9830

Email: larry@pdxlaw.com

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

CR 05-60008 HO

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST Defendant, Pirouz Sedaghaty, by and through his attorneys, Lawrence
Matasar and Federal Public Defender Steven T. Wax, hereby submits the
following Fourth Amended List of Potential Exhibits.

Trial Ex. #	Exhibit Description
0601	Constitution of Al Haramain Islamic Foundation (Saudi Arabia)
0602	Monthly report and statement of purpose (PF)
0602(A)	Monthly Report and Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation March 6, 1998
0602(B)	Signed Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation
0602(C)	Statement of Purpose and Declaration of Cooperation between Qu'ran Foundation and Al Haramain Islamic Foundation with printed signatures Solimon Al Buthe, Abu Unus, Dawood Rodgers, and Robert L. Brown
0603	Letter March 31, 1998, Qu'ran Foundation to Al Haramain Foundation
0604-0605	Reserved
0606	Email January 1, 2000, 2:37 p.m. P to Al Buthe
0607	Photograph Pete Seda and Solomon Al Buthe under tree
0608	Photograph Pete Seda, Rob Brown, John Dunn and David Rodgers
0609	Photograph including Rob Brown, David Rodgers, and Pete Seda

Page 2 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0610	Photograph of 3800 S Highway 99 with camel
0611	Photograph of cultural tent at 3800 South Highway 99
0612	Photograph Al Haramain building
0613	Photograph of David Rodgers with King Abdullah
0614	Email June 26, 2000 AQ to b@qf.org on his trip - and extremism
0614(A)	Attachment to June 26 2000 email June 25, 2000 Al Buthe to AQ
0615-0627	Reserved
0628	December 2, 1999, article from NY TIMES "McCain Urges Ending Aid To Russia In Wake Of Chechen Policy"
0629	ABC News.com page, December 9, 1999, "Yeltsin Lashes Out"
0630	THE INDEPENDENT web page December 11, 1999, "In A Powerless, Frozen City Of No Food, The Blind Hear The Bombs And Know There Is No Escape; Sarah Richards Toured Chechnya's Capital As Russian Forces Closed In, And Was Among The Last To Leave." [replaced with different version]
0631	TIME webpage December 13, 1999, "Campaign 2000: Foreign Policy: Where McCain Hits Bush The Hardest"
0632	Doctors Without Borders webpage December 15, 1999, "Chechnya: The Tracking of Civilians"
0633	CNN.com webpage December 16, 1999, "Albright Delivering 'strong message' to Russia"
0634	Email December 29, 1999 at 5:20 a.m., Raya Shokatfard to lz@qf.org , with CNN.com webpage December 18, 1999, "Russian Bombardment Intensifies As Troops Close On Grozny" [replaced with a complete version]

Page 3 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0635	Webpage The Gazette, February 6, 2000, "Escape From Chechnya" [replaced with different version]
0636	Reserved
0637	Email February 17, 2000 at 1:02 a.m., Q to AQ with CNN webpage February 16, 2000, "NATO, Russian Relax Tense Relations" [replaced with a complete version]
0638	Reserved
0639	Article Ria Novosti February 28, 2000, "Saudi Arabia to Provide Humanitarian Aid For Refugees"
0640	Human Rights Watch Report February 29, 2000, "War Crimes In Chechnya And The Response Of The West"
0641	Email February 21, 2000 at 11:34 p.m. The Arborist to b at qf.org with CNN.com February 21, 2000 Russia Chechnya webpage [replaced with a complete version]
0642	CNN.com Website Pages March 22-31, 2000
0643	UN Commission on Human Rights Resolution of April 25, 2000
0643(A)	United Nations Foundation U.N. wire April 26, 2000, "U.N. Seeks Inquiry Into Violations In Chechnya"
0644	MSF-USA special report, November 22, 2000, Chechnya, The Politics Of Terror
0645	United Nations High Commissioner for Human Rights Resolution 2001/24
0646	U.S. Senate Committee on Foreign Relations, Joseph R. Biden, February 12, 2004
0647	State Department Russia Country Report 1999
0648	State Department Russia Country Report 2000

Page 4 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0649	State Department Russia Country Report 2001
0650	NY Times 10/30/99 "Fears Rise for Chechen Refugees as Winter Nears"
0651	Reserved
0652	Congressional Research Service Report for Congress: Chechnya Conflict: Recent developments (May 3, 2000)
0653	News article U.S.: Chechen Officials Hold Talks at State Department (February 2, 2000)
0654	Time.com News Article, Why Russia May Keep Chechen Capital in Ruins (February 7, 2000)
0656-0663	Reserved
0664	Email September 18, 2001 from Florin to Pete Seda plus attachment
0664(A)	September 21, 2001, 9:25 a.m. P to Council of American Islamic Relations plus attachment
0665	Email September 21, 2001, 9:33 a.m. P to CIC@cicnow.com
0666 - 0667	Reserved
0668	Bank of America Check and traveler's check purchase
0669	Email January 11, 2000, 14:38:08 S. El Fiki to Haramain
0670	Email January 18, 2000, Haramain to S. El Fiki
0671	Email February 21, 2000, 9:12 a.m. head office to S. El Fiki
0672	February 21, 2000, Letter Aqeel to S. El Fiki
0673	February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait

Page 5 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0673(A)	English translation of February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait
0673(B)	Declaration of Translation of February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait
0674	Email February 24, 2000 P to Al Buthe RE money transferred
0675	Reserved
0676	Email March 27, 2000, 8:36 a.m. Al Haramain to S. El Fiki
0677	Letter April 13, 2000, Mahmoud T. El Fiki from National Bank of Kuwait
0678	Redacted Federal Bureau of Investigation 302 interview report of Mahmoud Talaat El Fiki, investigation on January 31, 2005
0679	Kuwait Bank record for El Fiki
0680	Email May 11, 1999 Barhoush to Haramain et al Subject: Urgent Albanian Translation
0680(A)	Email Abdul Qaadir to Haramain May 11, 1999 Report of Committee on Albania
0681	Email December 11, 1999, Abdul Qaadir to Qur'an and Sunnah Net Group; Jeddah-Net@muslimsonline.com
0682	Email December 28, 1999, 4:26 p.m. from Info to Info@irw.org
0683	Email December 30, 1999, 8:50 p.m. P to Al Buthe
0683(A)	Attachment to email Statement in Spanish and English from Ayuda Internacional Al Desplazado
0683(B)	Email from Al Buthe to P December 31, 1999 Human Help for Chechnya

Page 6 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0683(C)	Email January 1, 2000 1:46 P to Al Buthe RE Horrible Condition
0683(D)	Email from Al Buthe to P, January 2, 2000 at 4:58 AM
0684	Email from Head Office to Bilal Ibrahim with cc to Pete, January 3, 2000 at 3:10 AM
0685	Email from Abdul-Qaadir to q@qf.org, January 4, 2000 at 1:00 AM
0685(A)	Email attachment January 4, 2000 at 1:00 AM
0686	Email January 6, 2000, 1:35 a.m. Al Buthe to P
0686(A)	Email January 6, 2000, 1:37 a.m. Al Buthe to P
0686(B)	Email January 7, 2000, 3:48 p.m. Info to Info@irw.org
0686(C)	Email January 12, 2000, 5:43 p.m. Info to Info@irw.org
0687	Email Daveed Gartenstein-Ross to P January 17, 2000
0687(A)	Email P to Daveed Gartenstein-Ross January 17, 2000
0687(B)	Email Chain P to B February 21, 2000, including Daveed Gartenstein-Ross to P 1/17/2000 RE Horrible Condition and P to Al Buthe 1/1/2000 RE Horrible Condition
0687(C)	Email P to Daveed Gartenstein-Ross January 18, 2000 plus attachment
0687(D)	Email P to Daveed Gartenstein-Ross January 18, 2000
0688	Email Ashland to Al Buthe January 18, 2000
0688(A)	Email January 22, 2000, 11:23 p.m. Ashland to Al Buthe
0689	Letter January 24, 2000, Pete Seda to Responsible Secretariet of Federation Committee for International Technical Humanitarian Cooperation

Page 7 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0689(A)	Email January 27, 2000, 10:08 a.m. Info to Info@irw.org
0690	Email AQ to Sheeshan February 3, 2000
0691	Email P to Daveed Gartenstein-Ross February 4, 2000
0691(A)	Email P to Daveed Gartenstein-Ross February 8, 2000
0692	Email Q to AQ February 12, 2000
0692(A)	Email from Q to Sunnah, February 12, 2000, with path to Time.com, Photo Essay RE: Grozny
0692(B)	Photographs Time.com photo essay, Russian Soldiers Rest in Downtown Grozny
0692(C)	Blinded and Bound, Chechen Civilians
0692(D)	Chechen Men in Pit
0692(E)	Chechen Boy in Cellar
0692(F)	Chechen Woman with Son
0692(G)	Fallen City
0693	Email P to Al Buthe February 15, 2000
0693(A)	Email The Arborist to Al Buthe February 17, 2000
0693(B)	Email P to B February 19, 2000
0693(C)	Email P to Al Haramain February 20, 2000
0694	Email February 20, 2000 The Arborist to b@qf.org
0694(A)	Email P to MCA February 21, 2000 11:40
0694(B)	Email February 21, 2000, 11:34 p.m. from The Arborist to B@qf.org

Page 8 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0694(C)	Email February 21, 2000, 10:54 a.m. The Arborist to B@qf.org
0694(D)	Email February 21, 2000 5:48 p.m. The Arborist to B [replaced with different version]
0694(E)	Web page Medecins Sans Frontieres
0694(F)	Web page United Nations
0695	Email Chain P to B February 21, 2000 including P to Daveed Gartenstein-Ross 2/19/2000 and Daveed Gartenstein-Ross to P 2/8/2000 RE: Chechnya
0696	Email AQ to Sheeshaan February 23, 2000
0697	Email February 29, 2000, 12:16 p.m. P to B@qf.org
0697(A)	Email Q to PJFlorin February 29, 2000
0697(B)	Email P to B March 1, 2000
0698	Memorandum March 1, 2000, Catherine Granel from Bilal Abdul-Kareem, "Aid to the People of Chechnya"
0698(A)	Email Q to Granel March 1, 2000 with Memo to Bilal
0698(B)	Web Page Doctors of the World Staff 2000
0698(C)	Email March 1, 2000, 10:55 a.m. Q to P@qf.org
0698(D)	Email March 1, 2000, 11:29 a.m. P to PJFlorin@jeffnet.org
0698(E)	Letter March 1, 2000 Bilal to Catherine Granel RE: Aid to the people of Chechnya
0698(F)	Email March 1, 2000 P to Q RE: Letter to Doctors
0698(G)	Letter Attachment to March 1, 2000 email Subject: Aid to the People of Chechnya
0698(H)	Email Q to The Arborist March 3, 2000

Page 9 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0699	Email P to Al Buthe March 3, 2000
0699(A)	Email March 4, 2000 p to q@qf.org
0699(B)	Attachment to Email March 4, 2000
0700	Email March 5, 2000 P to b@qf.org FW: I need your help!
700(A)	Web printout, World Food Program, Azerbaijan, printed February 29, 2000
700(B)	Web printout, World Food Program Delivers - The Balkans, printed February 29, 2000
700(C)	Web printout, World Food Program Bread Story - Kosovo, printed February 29, 2000
700(D)	Web printout, World Food Program Logistics Photo Gallery, picture of airplane dropping food, printed March 1, 2000
700(E)	Web printout, World Food Program Logistics Photo Gallery, picture of helicopter, printed March 1, 2000
700(F)	Web printout, World Food Program Logistics Photo Gallery, picture of truck convoy, printed March 1, 2000
700(G)	Web printout, World Food Program Logistics Photo Gallery, picture of loaded truck, printed March 1, 2000
0701	Email March 15, 2000 from Info to Harith RE Eid Mubarak
0701(A)	April 2, 2001, 9:58 a.m. CIC@cicnow.com
0702 - 0703	Reserved
0704(A)	Al Haramain Islamic Foundation receipt No. 262740
0704(B)	English translation of Al Haramain Islamic Foundation receipt No. 262740
0705(A)	Al Haramain receipt no. 263867

Page 10 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0705(B)	English translation of Al Haramain receipt no. 263867
0706(A)	Al Haramain log page of receipts no. 262740 & 263867
0706(B)	English translation of Al Haramain log page of receipts no. 262740 & 263867
0707(A)	Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004
0707(B)	Certificate of translation of Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004
0707(C)	English translation of Certificate of translation of Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004
0708 - 0712	Reserved
0713	Al Suwailem Declaration
0714(A)	Diwan Presidency of Counsel of Ministers
0714(B)	English translation of Diwan Presidency of Counsel of Ministers
0715(A)	Diwan memo to His Royal Highness Minister of Interior re: Chechen Relief and SJRC
0715(B)	English translation of Diwan memo to His Royal Highness Minister of Interior re: Chechen Relief and SJRC
0716(A)	Kingdom of Saudi Arabia, Saudi Joint Relief Committee (SJRC) for the Aid of the People of Kosovo
0716(B)	English translation of Kingdom of Saudi Arabia, Saudi Joint Relief Committee (SJRC) for the Aid of the People of Kosovo
0717(A)	Memo to His Excellency Minister of Finance and National Economy

Page 11 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0717(B)	English translation of Memo to His Excellency Minister of Finance and National Economy
0718(A)	Order of King Fahad Bin Abdulaziz Al-Saud
0718(B)	English translation of Order of King Fahad Bin Abdulaziz Al-Saud
0719(A)	Al Haramain Humanitarian Foundation memorandum November 4, 1999
0719(B)	English translation of Al Haramain Humanitarian Foundation memorandum November 4, 1999
0720(A)	Telegram to the Minister of the Interior, re: Saudi Joint Committee November 10, 1999
0720(B)	English translation of Telegram to the Minister of the Interior, re: Saudi Joint Committee November 10, 1999
0721(A)	Minutes of meeting of the Chechnya Committee/Saudi Joint Relief Committee January 1, 2000
0721(B)	English translation of Minutes of meeting of the Chechnya Committee/Saudi Joint Relief Committee January 1, 2000
0722(A)	Memo from Al Haramain Charity Foundation January 4, 2000
0722(B)	English translation of memo from Al Haramain Charity Foundation January 4, 2000
0723(A)	Report of Saudi Joint Relief Committee for Kosovo and Chechnya (Chechnya Committee) February 15, 2000
0723(B)	English translation of Report of Saudi Joint Relief Committee for Kosovo and Chechnya (Chechnya Committee) February 15, 2000
0724(A)	Brief report what Chechnya Committee has achieved abroad

Page 12 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0724(B)	English translation of brief report what Chechnya Committee has achieved abroad
0725(A)	Declaration of Vladimir Matusevitch August 23, 2004
0725(B)	Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya in Russian and Arabic
0725(C)	English translation from Arabic of Memo of Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya
0725(D)	English translation from Russian of Russian and Arabic language version of Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya
0725(E)	Russian language version of Certificate 9927 of the State Registration Chamber
0725(F)	English translation of Certificate 9927 of the State Registration Chamber
0726(A)	Telegram regarding Al Haramain, Chechnya and Saudi Joint Relief Committee June 2, 2003
0726(B)	English translation of Telegram regarding Al Haramain, Chechnya and Saudi Joint Relief Committee June 2, 2003
0727(A)	Telegram to Al Rajhi Banking and Investment Corporation March 14, 2004
0727(B)	English translation of Telegram to Al Rajhi Banking and Investment Corporation March 14, 2004
0728(A)	Confirmation from Minister of Justice regarding Al Haramain Islamic Foundation March 21, 2004
0728(B)	English translation of Confirmation from Minister of Justice regarding Al Haramain Islamic Foundation March 21, 2004
0729(A)	Statement from Al Haramain Charity Foundation May 3, 2004

Page 13 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0729(B)	English translation of Statement from Al Haramain Charity Foundation May 3, 2004
0730	Unclassified summary regarding monies destined for needy Chechen families
0731	Al Haramain Website list of Al Haramain bank accounts
0732 - 0747	Reserved
0748	Handwritten document captioned "Wire Transfer" top line \$2767
0749(A)	Email December 30, 1999 8:20 a.m. Tom to Pete Seda
0749(B)	Proposal attachment to email: Letter Tom Wilcox to Pete Seda December 30, 1999
0750	Engagement letter from Tom Wilcox to Pete Seda
0751	Handwritten list, top line 2/24/2000 Mahmoud T. El Fiki
0752	Check #9733 June 23, 2000
0753	Check #9733 6/23/2000
754.42318	2000 Form 990
754.42335	2000 State CT-12 Return
754.42477	2001 Form 990
754.42494	2001 State CT-12 Return
754.42532	Letter from Internal Revenue Service to Al Haramain dated September 2, 2002
754.42533	Letter from Internal Revenue Service to Al Haramain dated February 20, 2002
754.42540	Letter from OR DOJ to Al Haramain dated October 30, 2001

Page 14 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

754.42659	Letter from OR DOJ to Al Haramain dated June 19, 2001
754.42703	Letter from OR Dept of Revenue to Al Haramain dated August 8, 2000
754.42810	Letter from Internal Revenue Service to Al Haramain dated May 31, 2002
754.42895	Letter from OR DOJ to Al Haramain dated February 22, 2001
754.42896	1999 Form 990
754.43005	1998 Corporate Return Form 1120
754.43014	Oregon Corporation excise tax return 1998
754.43075	Letter from Internal Revenue Service to Al Haramain dated December 7, 2000
754.43104	Letter from Internal Revenue Service to Al Haramain dated October 13, 2000
754.43111	Letter from Tom Wilcox to OR DOJ dated September 22, 2000
754.43112	Letter from OR DOJ to Al Haramain dated September 7, 2000
754.43127	Letter from Tom Wilcox to Internal Revenue Service dated September 25, 2000
754.43129	Letter from Internal Revenue Service to Al Haramain dated September 6, 2000
754.43156	Letter from Tom Wilcox to Internal Revenue Service dated August 17, 2000
754.43158	Letter from Internal Revenue Service to Al Haramain dated March 24, 2000
754.43193	1023 Application

Page 15 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

754.43219	Letter from OR DOJ to Al Haramain dated January 14, 2004
754.43220	Letter from Internal Revenue Service to Al Haramain dated February 9, 2004
754.43238	Letter from Internal Revenue Service to Al Haramain dated March 16, 2000
754.43252	Letter from OR DOJ to Al Haramain dated July 26, 2000
754.43257	Letter from OR DOJ to Al Haramain dated April 11, 2000
754.43337	Letter from Internal Revenue Service to Al Haramain dated December 22, 2003
754.43340	Letter from OR DOJ to Al Haramain dated November 21, 2003
754.43341	Letter from OR DOJ to Al Haramain dated October 16, 2003
754.43356	Letter from OR DOJ to Al Haramain dated June 4, 2003
754.43360	Letter from OR DOJ to Al Haramain dated April 4, 2001
754.43411	Letter from OR DOJ to Al Haramain dated October 30, 2000
754.43433	Letter from Tom Wilcox to Internal Revenue Service dated January 3, 2002
754.43434	Letter from Internal Revenue Service to Al Haramain dated December 31, 2001
754.43437	Letter from Tom Wilcox to Internal Revenue Service dated October 2, 2001
754.43438	Letter from Internal Revenue Service to Al Haramain dated September 24, 2001
754.43447	Letter from OR DOJ to Al Haramain dated August 24, 2001

Page 16 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

754.43459	1999 State CT-12 Return
754.43462	Letter from Tom Wilcox to OR DOJ dated January 8, 2001
754.43487	Letter from Internal Revenue Service to Al Haramain dated February 4, 2000
754.43512	Letter from Internal Revenue Service to Al Haramain dated June 1, 2000
754.43660	Letter from Internal Revenue Service to Al Haramain dated April 18, 2001
755.1	Email from P to Tom Wilcox, May 14, 2001
755.2	Attachment to 755.1 - QuickBooks File
755.3	Floppy Disk from Tom Wilcox, Labeled "Al Haramain 6/14/2001"
755.4	QuickBooks file located on 755.3
755.5	Email January 7, 2002 from Tom Wilcox to P
755.6	Attachment to 755.5 - QuickBooks File
755.7	Jeff Cone, Audit Trail, January 1999 through December 2003 [first page has been redacted]
755.8	Jeff Cone, Financial Statement Transactions: QuickBooks Audit Report Emulation
755.9	Email March 13, 2001 from Tom Wilcox to Pete Sedda
755.10	Attachment to 755.9 - QuickBooks File
755.11	Email June 12, 2001 from P to Shoumar, Abdulaziz S (rrd)
755.12	Attachment to 755.11 - QuickBooks File
755.13	September 19 - 24 Wilcox Data Entry Report

Page 17 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0756	Email January 2, 2000, 1:13 p.m. P to Ms. Katkhouda
0757-0758	Reserved
0759	Email February 26, 2000, 12:45 a.m. from Al Buthe to P@qf.org
0760	Email March 6, 2000 Al Shoumar to q@qf.org
0760(A)	Attachment to Email March 6, 2000 Al Shoumar to q@qf.org
0761	Email from Q to P March 7, 2000, Six months budget with attachment
0762	Email from P to Shoumar January 3, 2001 RE springfield@Al Haramain.org
0763-0800	Reserved
0801	Email April 1, 2000, 3:07 p.m. P to Raya Shokatford
0802	Letter Proposal April 11, 2000, Pete Seda
0803(A)	Email April 12, 2000, 11:57 a.m. PJFlorin@jeffnet.org to Pete Seda
0803(B)	Draft greetings letter.doc attached to email
0803(C)	Draft public relations letter re Islam attached to email
0803(D)	Draft Greeting Letter (PF)
0803(E)	Draft greeting letter (short version) PF
0803(F)	Letter April 11, 2000 Public relation plan (PF)
0804(A)	Email April 18, 2000, 3:05 p.m. PJFlorin @jeffnet,org to Pete Seda
0804(B)	Draft Jewish Community letter attached

Page 18 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0804(C)	Draft anti-terrorism letter to Sheik Aqeel attached to April 11, 2000, email
0804(D)	Letter to April 18, 2000 to Rabbi Zaslow (PF)
0804(E)	Letter April 18, 2000 to Rabbi Sirinski (PF)
0805(A)	Email April 19, 2000 12:46 a.m. Ashland to Al Buthe
0805(B)	Attachment to email, Letter April 19, 2000, Pete Seda to Aqeel al Aqeel
0806	Letter April 19, 2000, Pete Seda to Aqeel al Aqeel
0807	Email July 5, 2000, 11:52 a.m. PJFlorin@jeffnet.org to Pete Seda plus attachment
0807(A)	Draft letter to Shiukh (PF)
0808	ASHLAND DAILY TIDINGS September 15, 2001
0809	Letter September 18, 2001, Al Haramain Foundation, signed by Pete Seda, to Office of Emergency Relief, City of New York
0809(A)	Letter September 18, 2001 to NYC (PF)
0810	Letter September 18, 2001, Pete Seda to State Department
0810(A)	Draft September 2001 Justice for All (PF)
0810(B)	Draft September 2001 Justice for All (PF)
0811	Letter September 18, 2001, Pete Seda to Office of Emergency Relief
0812	Letter September 20, 2001, Pete Seda to My Dear Brothers and Sisters, Call for Islamic Outreach
0812(A)	Call For Islamic Outreach (PF)
0813	Letter to State Department 9/18/2001 (PF)

Page 19 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0813(A)	Letter September 20, 2001, Secretary of Health and Human Services, Tommy Thompson, from Pete Seda
0814	Mail Tribune article, September 20, 2001
0815	Letter to the Editor by Pete Seda
0815(A)	Press Release "From The Muslim Heart" (PF)
0816	Email September 21, 2001, 9:15 p.m. Marisa Petersen to Qur'an Foundation
0817	Email September 23, 2001, 10:59 a.m. A to letters@tucsoncitizen.com
0818	Email September 23, 2001, 6:45 p.m. A to Oelrichs@rockymountainnews.com
0819	Email September 23, 2001, 7:31 p.m. A to letters@washpost.com
0820(A)	Email September 26, 2001, 11:04 a.m. Florin to Pete Seda
0820(B)	Letter September 26, 2001, Pete Seda to Senator Wyden
0820(C)	Letter Form: Educational Outreach Services (PF)
0821	Letter October 2, 2001, Congressman Greg Walden to Pete Seda
0822	Letter October 2, 2001, Pete Seda to Dear Spiritual Leader
0823	Letter October 5, 2001, Federal Bureau of Investigation Thomas J. Pickard to Pete Seda
0824	Email October 7, 2001, 2:28 p.m. The Arborist to Traci Dow
0825	Email October 7, 2001, 3:05 p.m. A to DBerger and attachment

Page 20 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0826	Email October 14, 2001, 1:16 p.m. Scarlet Ledesma to Pete@TheArborist.com
0827	Reserved
0828	Letter October 24, 2001, Department of the Army, Office of Chief of Chaplins, to Pete Seda
0829	Letter November 19, 2001, Federal Bureau of Investigation to Pete Seda
0830	Email November 27, 2001 2:57 pm, from Peace Hhouse to recipient list
0831	Email November 28, 2001 7:58 am, Victoria Lane to P
0832	Announcement of community benefit concert Saturday, December 1, 2001
0833	Press release March 2002
0833(A)	Press Release - Six Month Anniversary of 9/11 (PF)
0834	Email Pete Seda To Pat Florin, March 12, 2002 Al Haramain Press Release (PF) [repleed with different document]
0835	Letter March 15, 2002, Pete Seda to Senator Joseph Biden
0835(A)	Letter To Biden, March 14, 2002 (PF)
0836(A)	Email October 14, 2002, from Florin to Pete Seda
0836(B)	Attachment to Email October 14, 2002, from Florin to Pete Seda
0836(C)	Letter To Scholars Of The Ummah (PF)
0837	Reserved
0838	Letter November 4, 2002, Pete Seda to Brothers in Al Haramain Islamic Foundation

Page 21 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0839	Letter 10th of Sha'ban 1423 Pete Seda to Scholars of the Ummah
0840	Memo January 28, 2003, Secretary of State Powell from Pete Seda
0840(A)	Letter January 28, 2003 from Pete Seda to Charles Matthews seeking Fatwah on Bin Laden
0840(B)	Letter To Colin Powell, January 27, 2003 (PF)
0840(C)	Letter January 28, 2003 Pete Seda to David Carroll RE Islamic legal case against Osama Bin Laden
0841 - 0852	Reserved
0853	Letter February 14, 2002, United States Department of Justice, Criminal Division, to Pete Seda
0854	Letter July 2, 2002, Pete Seda to Dave Carroll
0855	Consent 10/3/01 for David Carroll to access Al Haramain Bank Account
0856	Photograph Pete Seda with United States UAE Ambassador Michele J. Sison
0857 - 0865	Reserved
0866	Letter April 22, 2002, Pete Seda to Israeli Embassy
0866(A)	Email Pat Florin To Pete Seda, Re: Letter re Palestinian Aid (PF), plus attachment
0867	Letter April 22, 2002, Pete Seda to Licensing Division, Office of Foreign Assets Control
0868(A)	Email April 22, 2002, P to Florin 4:43 pm
0868(B)	Attached letter to Israeli Embassy April 22, 2002
0869	Email April 23, 2002 8:19 am, Brett Schor to P

Page 22 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0870	Letter May 2, 2002, Ambassador Kurtzer to Pete Seda
0871	Emails May 13,2002, P.S to Benny Dagin
0872	Letter May 14, 2002, Pete Seda to Lorraine Lanlor, Office of Foreign Assets Control
0873	Letter May 14, 2002, Pete Seda to Compliance Division Office of Foreign Assets Control
0873(A)	Letter To Office of Foreign Assets Control, Re: Humanitarian Aid For Palestinians (PF)
0874(A)	Email May 28, 2002, 1:25 pm P.S to Florin
0874(B)	Letter May 28, 2002, Pete Seda to Earl Wall; attachment to May 28, 2002 letter
0874(C)	Letter To Earl Wall, CARE, May 28, 2002 (PF)
0875	Letter June 19, 2002, Office of Foreign Assets Control to Martin McMahon, Esquire
0875(A)	Email Pat Florin to P.S, June 20, 2002, Benny Dagan (PF)
0876	Letter July 1, 2002, Pete Seda to Richard Newcomb, Office of Foreign Assets Control
0877(A)	Email July 2, 2002, 2:10 pm David Berger to Pete Seda
0877(B)	Letter July 2, 2002, Pete Seda to Police Chief Scott Fleuter
0877(C)	Letter July 2, 2002, to Lieutenant Patten
0878	Letter July 16, 2002, Pete Seda to Israeli Colonel Isaac Gurvich
0879	Letter July 17, 2002, Pete Seda to Ambassador Kurtzer
0880	Letter July 17, 2002, Pete Seda to United States Embassy, Economics Section, Ava Rogers

Page 23 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0881	Letter July 17, 2002, Pete Seda to Deborah Schwartz, United States Embassy, Israel
0882	Fax July 22, 2002, Ava Rogers, U.S. Embassy to Pete Seda
0882(A)	Email Pete Seda to Pat Florin, July 22, 2003 With Ava Rogers.jpg (PF)
0882(B)	Attachment to Ex 882(A), "7 22 02 Ava Rogers.jpg" (PF)
0883(A)	Email July 22, 2002, Florin to P.S 11:24 am
0883(B)	Letter July 22, 2002, Pete Seda to Ava Rogers, U.S. Embassy
0883(C)	Letter July 22, 2002 Pete Seda to Ava Rogers United States Embassy Re: Humanitarian Aid in the West Bank and Gaza (PF)
0884	Letter July 23, 2002, Pete Seda to Ian Barukh, Israeli Foreign Ministry
0885	Letter July 26, 2002, Rabbi Zaslow
0886(A)	Email July 30, 2002, P.S. to David Berger 2:28 p.m. [replaced with different document]
0886(B)	Letter Israeli government July 28, 2002
0887	Fax July 31, 2002, Leah Tsemel to Pete Seda
0888	Letter Pete Seda to Ms. Orley, Israel Defense Forces
0889	Email August 27, 2002, Florin to P.S, with email from P.S to Florin
0890	Stained Peace of My Heart Aug 2002 (PF)
0891 - 0905	Reserved
0906	Email February 21, 2000, 8:50 p.m.wsra99@aol.com to P@qf.org

Page 24 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0907	Email March 29, 2000, 11:32 a.m. P to wsra99@aol.com
0907(A)	Email March 30, 2000 P to Al Buthe FW: Agreement
0907(B)	Email March 30, 2000 P to Al Buthe FW: Agreement with attachment
0908(A)	Email October 26, 2001, 4:48 p.m. Sandra Kay to Pete Seda
0908(B)	Attached letter, October 26, 2001, to Steve Monroe at Office of Foreign Assets Control
0909(A)	Letter November 1, 2001, Pete Seda to Emily Clay at Office of Foreign Assets Control
0909(B)	Letter November 2, 2001, Office of Foreign Assets Control to Pete Seda
0909(C)	Letter November 1, 2001 Pete Seda to Emily Clay Office of Foreign Assets Control Application for license to distribute food to Afghani refugees (PF)
0910	Email October 9, 2000 P to Al Buthe RE; Tajikistan
0911	Email October 23, 2001 P to Al Buthe RE make it work out – with attachments
0912 - 0924	Reserved
0925	Photograph Pete Seda with truck
0926	Article REGISTER GUARD, "Fate of Big Leaf Maples in Whiteaker Up In The Air"
0927	Email January 20, 2000, 7:41 p.m. Brad and Rooney Riggs to P
0928	Email February 11, 2000, 6:56 p.m. Jim Hartman to Pete Seda
0929	Ashland Watershed Partnership meeting notes March 28, 2000

Page 25 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0930	Email November 17, 2000, 3:08 p.m.: Swales to @mind.net	
0931	Email April 11, 2001, 11:56 a.m. Rose Hill to P@qf.org	
0932	Email June 24, 2001, 2:13 p.m. The Arborist to Colonel Swales	
0933(A)	Email October 17, 2001, Representative Greg Walden to Pete Seda	
0933(B)	Email December 6, 2001, Representative Greg Walden to Pete Seda	
0934	Photograph Pete Seda Cleaning Ashland	
0935	Photograph Pete Seda On Ladder	
0936	Photograph Pete Seda Cleaning with fire people	
0937	Photograph The Arborist Crew	
0938	Photograph Pete Seda with Governor Kitzhaber	
0939	Photograph Pete Seda Cleaning Downtown Ashland	
0940-0941	Reserved	
0942	Letter To Mayor Cathy Shaw, January 31, 2000 (PF)	
0943	Reserved	
0944	Hamrick Road Letter, April 20, 2000 (PF)	
0945	Reserved	
0946	8/8/00 Letter to William Keller (PF)	
0947-0955	Reserved	
0956	Photograph Pete Seda with children	
0957(A)	Email March 28, 2000, 3:25 p.m. Q to P@qf.org	

Page 26 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0957(B)	March 28, 2000 letter Pete Seda to Pastor
0958	Email May 23, 2000, 3:20 p.m. B to P
0959	Email October 22, 2000, 8:57 p.m. Kelly Bennett to Pete Seda Sedaghaty
0960	Email January 24, 2001, 12:13 a.m. P to Shalomrav@aol.com
0961	Email February 23, 2001, 1:56 p.m. Stan Way to P@qf.org
0962	Email May 11, 2001, 10:12 a.m. James Y. Horton to P@qf.org
0963	Email May 21, 2001, 2:22 p.m. Pam Long to P@qf.org
0964	Email May 22, 2001, 11:31 a.m. Peace House to Pete Seda et. al.
0965	Email July 02, 2001, 12:53 a.m. Pete Seda to BLJ_maj@yahoo.com
0966	Photograph Class at Al Haramain [replaced with a complete version]
0967	Photograph class at tent
0968	Photograph multi-cultural fair
0969	Photograph Religion Class at tent
0970	Photograph presentation at church
0971	Email Jane Claussen to P at QF.org, January 2, 2002
0972(A)	Email January 21, 2002, 1:50 pm, P to Florin
0972(B)	Attachment letter for Peace House

Page 27 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

0973	Bi-line article: Islamic Show Intrigues RCC, February 2002	
0974	Email February 1, 2002, Drake, Tommy to P at QF.org, 10:47 am	
0975	Email February 5, 2002, Closter, Larry to Q.	
0976	Photograph Pete Seda In Church	
0977	Photograph of Pete Seda lecturing to students	
0978	Photograph Pete Seda in Rabbi Zaslow's Temple	
0979-0986	Reserved	
0987	Email April 11, 2000, 8:13 a.m. B to P@qf.org	
0988	Email March 13, 2002, Stan Way to P	
0989(A)	Email April 19, 2002, P to Florin	
0989(B)	Attached letter to Senators and Reps	
0990	Booklet Islam Is by Pete Seda	
0991	Islamic T-Shirt	
0992 - 1001	Reserved	
1002	Pete Seda Video Statistics	
1002(A)	Pete Seda Video compilation CD	
1002(B)	Chechnya video compilation CD	
1003	Summary of prisoner letters (to be created)	
1004	Letter and Check \$300 November 15, 1999	
1005	Check \$50 November 20, 1999	
1006	Check \$100.00 November 20, 1999	

Page 28 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

1007	Check \$100.00 December 1, 1999
1008	Money order \$300 December 6, 1999
1009	Check \$400.00 December 20, 1999
1010	Check \$200.00 January 1, 2000
1011	Check and Envelope \$600.00 January 5, 2000
1012	Check \$150.00 January 19, 2000
1013	Check \$68.00 January 22, 2000
1014	Checks \$50,000.00, \$4,000.00, \$196.75 January 21, 2000
1015	Check and Deposit ticket February 23, 2000
1016	Check dated December 24, 1999, \$2,000.00
1017 - 1023	Reserved
1017 - 1023 1024	Reserved Photograph of Shrubbery
1024	Photograph of Shrubbery
1024 1025(A)	Photograph of Shrubbery Photograph of wire
1024 1025(A) 1025(B)	Photograph of Shrubbery Photograph of wire Photograph of wire Photograph of former President George W. Bush with Saudi
1024 1025(A) 1025(B) 1026	Photograph of Shrubbery Photograph of wire Photograph of wire Photograph of former President George W. Bush with Saudi Crown Prince Abdullah Copies of Receipt No. 418933 and Receipt No. 15881 written

Page 29 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

1029	Patricia Florin document list
1030	Chase Bank deposit ticket dated March 25, 2000
1031	Chechnya donations
1032 - 1033	Reserved
1034	Photograph of interior of trailer searched
1035 - 1046	Reserved
1047	Photograph of interior of trailer searched, specifically depicting a box of "Pete's tapes."
1048 -1053	Reserved
1054	Letter from Donald Stine, Chaplain, to Qu'ran Foundation, December 7, 1999
1055	Letter from Chaplain Denis K. Burrell to Alharamain Islamic Foundation, February 24, 2000
1056	Letter from Donald Stine, Chaplain, to Qu'ran Foundation, March 23, 2000
1057	Letter from Andrew Leatherman, Chaplain, to Al Haramain Foundation, July 19, 2000
1058	Email from Sgt. Vito D. Deure, U.S. Army Chaplain, to haramain@alharamain.org July 27, 2000
1059	Letter from Robert Thomas, Chaplain, to Al Haramain Islamic Foundation, August 1, 2000
1060	Letter from James E. Penn, Chaplain, to Quran Foundation, August 15, 2000

Page 30 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

1061	Letter from Rev. Steve Gadaire, Chaplain, to Al Haramain Foundation USA, August 16, 2000
1062	Letter from Mitch Anderson, Chaplain, to Al Haramain Foundation, February 21, 2001
1063	Letter from Joe T. Portugal, Chaplain, to Al Haramain Foundation, April 9, 2002
1064	Demonstrative Exhibit of QuickBooks Activity
1065	Springfield Building Schedule per Jeff Cone
1201	Email from WesternSom to <u>a@qf.org</u> , February 9, 1999 at 9:13 p.m.
1201(A)	Urgent Appeal Kosova, April 2, 1999, faxed to Al Haramain on April 2, 1999
1201(B)	Time Sheet of Mr. Gartenstein-Ross for April 1999
1201(E)	"Give Five Minutes For Kosova," Kosova Task Force, USA, Justice for All
1201(F)	Check written to Kosova Task Force, USA, dated April 2, 1999
1210	Email Exchange between Mr. Gartenstein-Ross and Soliman Al Buthe, May $4^{\rm th}$ and $5^{\rm th}$, 1999
1215	Request for Assistance from the Uma Women Society, dated December 23, 1999
1216	Email exchange between Mr. Gartenstein-Ross and Soliman Al Buthe, March 5, 2000
1238	Excerpt of Wilcox Working Papers Presented During Testimony
1238(A)	Check \$21,000 #9624

Page 31 DEFENDANT'S FOURTH AMENDED POTENTIAL EXHIBIT LIST

1238(B)	Check \$131,300 #9456
1238(C)	Check \$10,000 #9002
1238(D)	Check \$318,291.74 #9733
1238(E)	Reconciliation Report

Respectfully submitted on September 7, 2010.

/s/ Steven T. Wax
Steven T. Wax
Federal Public Defender

/s/ Lawrence H. Matasar
Lawrence H. Matasar